

RETURN DATE: FEBRUARY 14, 2017 : SUPERIOR COURT
MARGARET BRODIE : J.D. OF NEW HAVEN
V. : AT NEW HAVEN
CHURCH STREET NEW HAVEN LLC and
ALL-AROUND HOME IMPROVEMENTS, LLC : JANUARY 13, 2017

COMPLAINT

FIRST COUNT (As To Defendant, CHURCH STREET NEW HAVEN LLC)

1. The plaintiff, MARGARET BRODIE, is an individual who currently resides at 13A DeDiego Court, New Haven, Connecticut 06519.

2. The defendant, CHURCH STREET NEW HAVEN LLC, is a Delaware limited liability corporation, duly authorized to do business in the State of Connecticut, with a business address of c/o Northland Investment Corporation, 2150 Washington Street, Newton, Massachusetts 02462.

3. At all times hereinafter mentioned, the defendant, CHURCH STREET NEW HAVEN LLC, was in possession and control of, and owned and maintained the property/complex known as 1 Tower Lane, located on DeDiego Court, New Haven, Connecticut, where, on or about February 15, 2015, the plaintiff was injured.

4. On or about February 15, 2015, between 11:00 a.m. and 12:00 p.m., the plaintiff was walking towards her apartment from a friend's apartment across the complex, and

LAW OFFICES
GILLIS & GILLIS

*Professional
Corporation*

265 CHURCH STREET
SUITE 203
NEW HAVEN
CONNECTICUT 06510

TELEPHONE
(203) 562-5104
TELEFAX
(203) 495-6476
WEBSITE

www.gillislawfirm.com

was walking in the parking lot, near the car port, when she slipped and fell on the snow and ice-covered pavement.

5. Said fall-down was directly and proximately caused by the carelessness and negligence of the defendant, CHURCH STREET NEW HAVEN LLC, in one or more of the following ways:

- a. It failed to keep the premises clear from snow and ice;
- b. It failed to properly maintain the premises;
- c. It failed to post proper signs, warning others, including the plaintiff, of the icy and dangerous condition of the premises;
- d. It failed to warn others, including the plaintiff, of the icy and dangerous condition of the premises;
- e. It failed to provide a safe and clean premises;
- f. It failed to reasonably inspect the premises;
- g. It failed in that it knew, or should have known, of the existence of the aforesaid condition, yet allowed the same to exist without corrective means of activity or sanding or salting; and
- h. It failed to remove or instruct an agent to remove ice, snow, or other slippery substance from the premises.

6. As a result of the aforesaid fall-down accident, the plaintiff sustained the following injuries, some or all of which are or may be permanent in nature:

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*Professional
Corporation*

265 CHURCH STREET
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NEW HAVEN
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a. Injury to the right ankle, consisting of a bimalleolar fracture, which required closed reduction surgery and splinting;

b. Injury to the lumbar spine, consisting of sprain/strain; and

c. Injury to both hands, consisting of contusions.

7. As a result of the injuries sustained by the plaintiff in the aforesaid accident, the plaintiff has incurred expenses for prescriptions, physicians' services, medical supplies, and physiotherapy, all necessary for her recovery, and will be forced to expend additional sums in the future.

8. As a further result of the injuries sustained in the aforesaid accident, the plaintiff's earning capacity has been impaired, and will continue to be impaired in the future.

9. As a further result of the injuries sustained by the plaintiff in the aforesaid accident, the plaintiff remains unable to participate in and enjoy her usual activities.

SECOND COUNT (As To Defendant, ALL-AROUND HOME IMPROVEMENTS, LLC)

1. Paragraph 1 of the First Count is hereby made Paragraph 1 of this, the Second Count.

2. The defendant, ALL-AROUND HOME IMPROVEMENTS, LLC, is a Connecticut limited liability corporation with its principal place of business at 196 New Haven Avenue, Unit 436, Derby, Connecticut 06418, which was hired to maintain the premises known as 1 Tower Lane, New Haven, Connecticut, on or about February 15, 2015.

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GILLIS & GILLIS

*Professional
Corporation*

265 CHURCH STREET
SUITE 203
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CONNECTICUT 06510

TELEPHONE

(203) 562-5104

TELEFAX

(203) 495-6476

WEBSITE

www.gillislawfirm.com

3.-4. Paragraphs 3 and 4 of the First Count are hereby made Paragraphs 3 and 4 of this, the Second Count.

5. Said fall-down was directly and proximately caused by the carelessness and negligence of the defendant, ALL-AROUND HOME IMPROVEMENTS, LLC, its employees and agents, in one or more of the following ways:

- a. They failed to keep the premises clear from snow and ice;
- b. They failed to properly maintain the premises;
- c. They failed to post proper signs, warning others, including the plaintiff, of the icy and dangerous condition of the premises;
- d. They failed to warn others, including the plaintiff, of the icy and dangerous condition of the premises;
- e. They failed to reasonably inspect the premises;
- f. They failed in that they knew, or should have known, of the existence of the aforesaid condition, yet allowed the same to exist without corrective means of activity or sanding or salting; and
- g. They failed to remove or instruct an agent to remove ice, snow, or other slippery substance from the premises.

6.-9. Paragraphs 6 through 6 of the First Count are hereby made Paragraphs 6 through 9 of this, the Second Count.

LAW OFFICES
GILLIS & GILLIS

*Professional
Corporation*

265 CHURCH STREET
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CONNECTICUT 06510

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TELEFAX

(203) 495-6476

WEBSITE

www.gillislawfirm.com

WHEREFORE, the plaintiff claims compensatory monetary damages within the jurisdiction of this Court.

THE PLAINTIFF

By

JEFFREY S. ARMAS, ESQ.
Gillis & Gillis P.C.
265 Church Street, Suite 203
New Haven, CT 06510
(203) 562-5104
Juris No. 407911

LAW OFFICES

GILLIS & GILLIS

*Professional
Corporation*

265 CHURCH STREET
SUITE 203
NEW HAVEN
CONNECTICUT 06510

TELEPHONE

(203) 562-5104

TELEFAX

(203) 495-6476

WEBSITE

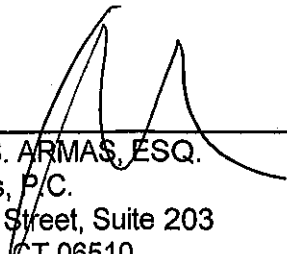
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STATEMENT OF AMOUNT IN DEMAND

The plaintiff claims monetary damages in excess of FIFTEEN THOUSAND
(\$15,000.00) DOLLARS.

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